

## REMARKS

The claims are provided as a convenience to the Examiner.

Claims 1, 2, 4, 7, 8, 10 and 13 are rejected under 35 U.S.C. 102(a) as being anticipated by Halperin et al. (US Patent No. 6,115,616); claims 3 and 9 are rejected under 35 U.S.C. 103(a) as being unpatentable over Halperin et al. and further in view of Harris (US Patent No. 6,222,458); claims 5, 6, 11, 12, and 14-18 are rejected under 35 U.S.C. 103(a) as being unpatentable over Halperin et al. and further in view of Kai (US Patent No. 4,882,471); and claims 19 and 20 are rejected under 35 U.S.C. 103(a) as being unpatentable over Halperin et al., Kai as applied to claim 17 above and further in view of Kinzie (US Patent No. 6,326,934). These rejections are respectfully disagreed with, and are traversed below.

Halperin et al. teaches a detachable keyboard which can equip both wireless handsets and cellular phones wherein,

“...a keyboard card is clipped to the rest of the handset and is completely detached from the body when unclipped. Wireless communication between the body and keyboard is used when the card is unclipped, while contacts are activated in the clipped position so that the wireless handset then functions as in the case of a non detachable keyboard. Alternatively, one can also use a version where the keyboard card is linked to the rest of the handset by a wire and can be easily clipped and unclipped to the body of the handset. (referring to column 1, lines 38-49, emphasis added)

The Examiner argues that “[i]n Halperin, the keyboard card can be “attached” to the handset by the user’s hands (i.e. holding the keyboard against the hand set). Therefore, the broad term “attach” still reads on Halperin reference by holding the keyboard on the handset and it still functions wirelessly.” This argument is respectfully disagreed with. The Merriam-Webster

dictionary defines “attach” as to make fast (as by tying or gluing) <attach a label to a package>.

Claim 1 recites in part,

“...a self-powered information entry part comprising a keypad or keyboard module that is detachable from said communication part and that is coupled, whether attached or detached, through a wireless link to said communication part for conveying keystroke information from said information entry part to said communication part.” (emphasis added)

The Examiner’s assertion that Halperin’s holding the keyboard against handset reads on the claim language of the present invention is unfounded.

Clearly, “attach” in Halperin et al. refers to when the keyboard is “clipped” to the handset. The keyboard card, in Halperin et al. “is completely detached from the body when unclipped.” Holding the keyboard on the handset, as suggested by the Examiner, would clearly be considered as being completely detached in Halperin et al.

Thus, the teaching of Halperin et al. fundamentally differs from the present invention as Halperin et al. clearly state that “[w]ireless communication between the body and keyboard is used when the card is unclipped” as opposed to the present invention wherein “a self powered information entry part comprising a keypad or keyboard module that is detachable from said communication part and that is coupled, whether attached or detached, through a wireless link to said communication part for conveying keystroke information from said information entry part to said communication part.”

This same argument applies to independent claim 7 and independent claim 13. Claims 1, 2, 4, 7, 8, 10 and 13 are thus clearly not anticipated by Halperin et al. In that independent claims 1, 7, and 13 are not anticipated by Halperin et al., dependent claims 2-6, 8-12, and 14 are also not

anticipated by Halperin et al. and should be allowed.

The Examiner is respectfully reminded that for a rejection to be made on the basis of anticipation, it is well recognized that “to constitute an anticipation, all material elements recited in a claim must be found in one unit of prior art”, Ex Parte Gould, BPAI, 6 USPQ 2d, 1680, 1682 (1987), citing with approval In re Marshall, 578 F.2d 301, 304, 198 USPQ 344, 346 (CCPA 1978).

In the instant case it is clear that Halperin et al. does not teach subject matter that would render claims 1-14 unpatentable under 35 U.S.C. 102(b). In fact, it may be argued that Halperin et al. discloses subject matter that actually teaches away from the claimed invention, as they specifically state that when the keyboard card is “clipped” to the body, “contacts are activated.”

Turning now to the 35 U.S.C. 103(a) rejections, claim 15 recites in part,

“an information entry part comprising a keypad or keyboard module that is separate from said communication part and that is coupled through an RF link to said communication part for conveying keystroke information from said information entry part to said communication part, said module comprising at least one solar cell for powering said module.”

Halperin teaches:

“A secondary battery B1 is provided on the keyboard card 16 and gets charged preferably whenever the main battery B2 of the handset gets charged.” (referring to column 2, lines 61-63)

“To avoid the need for a secondary battery, as well as the need of the transmitter/receiver E1-R2 combination, one can also use a wired communication between the keyboard card 16 and the main body 10. The frequent problems of

wire knotting can be easily avoided for this configuration since the extension only needs to be about three feet long.” (referring to column 3, lines 19-24)

Kai teaches electronic equipment which includes a keyboard portion arranged on an electronic equipment body for inputting data, a solar cell, arranged on the electronic equipment body, for supplying power, a cover for protecting the solar cell, and a display portion arranged on the cover wherein “(t)he power source portion 4 is connected to the body 1 through a flexible wire.” (referring to column 2, lines 51-53)

Halperin, et al. provides a secondary battery on the keyboard card that gets charged preferably whenever the main battery of the handset gets charged (i.e. when the detachable keyboard card is clipped to the body of the separate handset). It is not seen where one of ordinary skill in the art at the time of the present invention would be motivated to combine the teachings of Kai with Halperin et al. in order to arrive at a way to provide power to the keyboard card. This is true at least for the reason that in Kai the solar cell is arranged on the electronic equipment body, and not on a module separate from the electronic equipment body. Thus, it would not have been obvious to one of ordinary skill in the art at the time of the present invention to have combined the teaching of Kai with Halperin et al. in order to come up with a way to provide power to the keyboard module of Halperin et al. As was noted, Halperin et al. envision only providing a battery in the keyboard card, or a wire running to the handset, while the solar cell of Kai is disposed on the electronic equipment body per se and not on any separable component thereof.

Even if combined in the manner suggested by the Examiner, which is not admitted is suggested by a reading of the references, the resulting hybrid Halperin et al./Kai system would appear to suggest to one skilled in the art only a solar cell arranged on a main electronic equipment body and not on a card or module that is separate from the main electronic equipment body.

As that independent claims 15 and 17 are clearly not rendered unpatentable by the proposed combination of Halperin et al. and Kai, dependent claims 16 and 18-20 are also not rendered

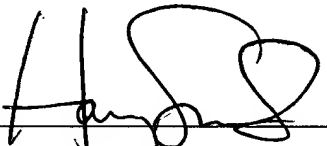
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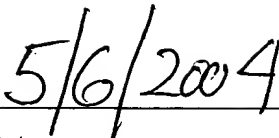
unpatentable by the proposed combination of Halperin et al. and Kai, whether considered alone or in combination with Kinzie (US Patent No. 6,326,934).

Based on the foregoing arguments, it should be clear that none of the prior art cited and relied on by the Examiner, either singularly or in combination, either anticipates or renders obvious the claimed subject matter. Claims 1-20 are thus clearly allowable over the prior art cited by the Examiner, and the Examiner is respectfully requested to reconsider and remove the rejections.

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Respectfully submitted:

  
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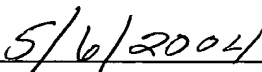
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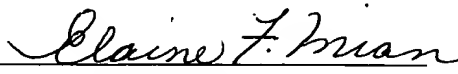
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